December 5, 2002

Mr. Randall L. Burkholder
Carriage, Inc.
P. O. Box 246
Millersburg, Indiana 46543

Re: 039-16070
First Significant Permit Modification to
Part 70 No.: T 039-6326-00456

Dear Mr. Burkholder:

Carriage, Inc. was issued a Part 70 permit on June 26, 2002 for a recreational vehicle (RV) and Class C motor home manufacturing plant. A letter requesting changes to this permit was received on August 29, 2002. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

This modification is related to the transfer of ownership of the fiberglass manufacturing operation from Carriage, Inc. to a separate source, Orbit Composites, Inc. and Better Way Products, Inc.. In this modification, emissions limit and record keeping requirements set for Volatile Organic Compounds (VOCs) for the fiberglass manufacturing operation have been deleted.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Carriage, Inc.
210 Wabash Street
Millersburg, Indiana 46543

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6326-00456	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 10, 1999

First Significant Source Modification: 039-11304 Issuance Date: July 7, 2000
First Administrative Amendment: 039-12420 Issuance Date: July 26, 2000
Second Administrative Amendment: 039-15544 Issuance Date: June 12, 2002

First Significant Permit Modification No. 039-16070	Pages Modified: 3, 4, 31, 32, 32a, 35d, 35e, 44
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 5, 2002

D.2.5 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.6 Record Keeping Requirements

D.3 FACILITY OPERATION CONDITIONS - Woodworking Operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-3]

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.3.3 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.4 Visible Emissions Notations

D.3.5 Baghouse Inspections

D.3.6 Broken or Failed Bag Detection

D.3.7 Cyclone Inspections

D.3.8 Cyclone Failure Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.9 Record Keeping Requirements

D.4 FACILITY OPERATION CONDITIONS - Surface Coating Operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

D.4.2 New Source Toxics Control and NESHAP [326 IAC 2-1-3.4][40CFR Subpart JJ]

D.4.3 Particulate Matter (PM)[326 IAC 6-3-2(d)][40 CFR 52 Subpart P]

D.4.4 Preventive Maintenance Plan

Compliance Determination Requirements

D.4.5 Testing Requirements

D.4.6 Volatile Organic Compounds

D.4.7 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.8 Particulate Matter

D.4.9 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.10 Record Keeping Requirements

D.5 FACILITY OPERATION CONDITIONS - Insignificant Activities

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-2-3]

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

D.5.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

D.5.4 Particulate Matter (PM) [326 IAC 6-3]

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to metal parts and products, for surface coating and aerosol spray operations in Buildings 3, 5, 7, 8, 9, 17A and 22 of Plant #1, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

(b) Solvent sprayed from application equipment, for metal surface coating and aerosol spray operations, during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in Building 12 of Plant #1 shall utilize one of the following application methods:

Airless Spray Application	Air Assisted Airless Spray Application
Electrostatic Spray Application	Electrostatic Bell or Disc Application
Heated Airless Spray Application	Roller Coating
Brush or Wipe Application	Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The surface coating used for touch-up or repair operations in Buildings 3, 5, 7, 9 and 22 of Plant #1 shall not exceed ten (10) gallons per day. Any change or modification which may increase the VOC usage from touch-up or repair operations for wood substrates to greater than ten (10) gallons per day shall comply with the requirements of 326 IAC 8-2-12 by using one of the application systems specified in the rule.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-6] [326 IAC 2-2]

The total VOC emissions from the following operations are limited at 8.25 tons per month:

(a) the VOC delivered to the applicators in Buildings 7 and 17A of Plant #1, including clean-up solvents.

Therefore, the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) do not apply.

These VOC emission limitations shall also render 326 IAC 2-2 not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(d)][40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) overspray from the spray booths shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The source will be in compliance with the requirement by using air filters at all times when the spray booths are in operation to control overspray emissions. The PM emission control will limit source wide potential PM emissions to less than 249 tons per year and, therefore, render 326 IAC 2-2 not applicable.

Pursuant to 326 IAC 6-3-2(d), the surface coating operations shall be subject to the following:

(1) The source shall operate the control device in accordance with manufacturer's specifications;
(2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
    (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground;
    (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground;

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1)] [40CFR 63, Subpart JJ]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Conditions D.1.1, D.1.3 and D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.3 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Particulate Matter (PM)

Pursuant to CP 039-2926-00179, issued on April 19, 1995, CP 039-4712-00205, issued on February 20, 1996, and CP 039-8817-00456, issued on September 26, 1997, the air filters for PM control shall be in operation at all times when the paint booths are in operation.

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Building 18A

(7) Three (3) surface coating booths, located in building 18A, known as SC1, SC2 and SC3, equipped with six (6) HVLP spray guns and dry filters for particulate overspray control, exhausted to stacks F1, F2 and F3, respectively, capacity: 44.05 cabinet doors per hour, each.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

(a) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in Building 18A shall utilize one of the following application methods:

Airless Spray Application	Air Assisted Airless Spray Application
Electrostatic Spray Application	Electrostatic Bell or Disc Application
Heated Airless Spray Application	Roller Coating
Brush or Wipe Application	Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(b) The input of VOC to SC1, SC2 and SC3, shall be limited to less than twenty-five 25.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period.

D.4.2 New Source Toxics Control [326 IAC 2-4.1-1]

(a) The input VOC is limited to less than 25.0 tons per year. Therefore, the source will not emit ten (10) tons per year of a single HAP or twenty-five (25) tons per year of any combination of HAPs. Thus, the requirements of 326 IAC 2-4.1-1 do not apply.

(b) Any change or modification that increases HAP emissions to greater than ten (10) tons per year and or twenty-five (25) tons per year must receive prior approval from OAM, IDEM.

D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(d)][40 CFR52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) overspray from the spray booths shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The source will be in compliance with the requirement by using air filters at all times when the spray booths are in operation to control overspray emissions.

Pursuant to 326 IAC 6-3-2(d), the surface coating operations shall be subject to the following:

(1) The source shall operate the control device in accordance with manufacturer's specifications;
(2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
    (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground;
    (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground;

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Carriage, Inc.
Source Address: 210 Wabash Street, Millersburg, IN 46543
Mailing Address: P. O. Box 246, Millersburg, IN 46543
Part 70 Permit No.: T039-6326-00456
Facility: Buildings 7 and 17A
Parameter: total VOC emissions
Limit: total VOC emissions from the following operations are limited at 8.25 tons per month:

(1) the VOC delivered to the applicators in Buildings 7 and 17A, including clean-up solvents.

YEAR: _____

Month	Total VOC Emissions (tons/mon)
Month 1	
Month 2	
Month 3	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Carriage, Inc.**
Source Location:	**210 Wabash Street, Millersburg, Indiana 46543**
County:	**Elkhart**
SIC Code:	**3792**
Operation Permit No.:	**T039-6326-00456**
Operation Permit Issuance Date:	**2-10-1999**
Permit Modification No.:	**039-16070**
Permit Reviewer:	**Madhurima Moulik**

The Office of Air Quality (OAQ) has reviewed a modification application from Carriage, Inc. relating to the operation of a recreational vehicle (RV) and Class C motor home manufacturing plant.

History

In March 2002, Orbit Composites, Inc. and Better Way Products, Inc. entered into an agreement with Carriage, Inc., to take operational control of equipment for producing fiberglass reinforced plastic products. The Part 70 permit for Carriage, Inc. (No. T039-6326-00456) was administratively amended on June 12, 2002 (Administrative Amendment No. 039-15544-00456), to process this transfer of operational control. In addition, a new Title V (No. T039-15744-00570) was issued to Orbit Composites, Inc. and Better Way Products, Inc. on June 26, 2002. Since then, Orbit Composites, Inc. and Better Way Products, Inc. have purchased the equipment, and thus assumed ownership of the fiberglass operation. On August 29, 2002, an application was received from Orbit Composites, Inc. and Better Way Products, Inc., to process the transfer of ownership of the fiberglass operation, and to modify Carriage, Inc.'s Part 70 permit accordingly. The application requested that all references to equipment at Orbit Composites, Inc. and Better Way Products, Inc. be deleted from the Part 70 permit issued to Carriage, Inc.

Permitted Emission Units and Pollution Control Equipment

Building 8

(1) one (1) airless paint spray booth with a maximum capacity of 0.5 units per hour, using dry filters as overspray particulate matter control, and exhausting through one (1) stack, identified as #92;

Building 12

(2) one (1) airless counter top assembly adhesive spray booth, with a maximum capacity of coating 10 units per hour, using dry filters as overspray particulate matter control, and exhausting through two (2) stacks, identified as #90 and #91;

Building 17A

(3) one (1) high pressure air-assisted paint spray booth, capable of coating 2.0 units of metal frame per hour, using dry filter banks as overspray particulate matter control and exhausting at one (1) stack, identified as 17A;

(4) miscellaneous VOC containing aerosol spray adhesives and handwipe solvents with following maximum coating rates:

(a) 0.25 units per hour in Building 3;
(b) 0.25 units per hour in Building 5;
(c) 0.75 units per hour in Building 7;
(d) 0.25 units per hour in Building 9;
(e) 0.25 units per hour in Building 22; and

(5) one (1) wood waste fired boiler in Building 20, with a fuel consumption rate of 750 pounds per hour and a rated capacity of 4.0 mmBtu/hr, equipped with a single 42" diameter cyclone for particulate matter emission control, and exhausting through one (1) stack, identified as #20.

Building 18

(6) One (1) woodworking operation, consisting of various woodworking tools, known as WW, equipped with a cyclone and baghouse connected in series, exhausted inside the building, capacity: 800 pounds of wood per hour.

Building 18A

(7) Three (3) surface coating booths, known as SC1, SC2 and SC3, equipped with six (6) HVLP spray guns and dry filters for particulate overspray control, exhausted to stacks F1, F2 and F3, respectively, capacity: 44.05 cabinet doors per hour, each.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) the following natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour (mmBtu/hr):

(a) Boilers
two (2) boilers in Building 5 each rated at 0.85 and 0.3 mmBtu/hr, four (4) boilers in Building 22 each rated at 0.5 mmBtu/hr, and four (4) boilers, known as H1 through H4, rated at 0.15 million British thermal units per hour, each;

(b) Water heaters
one (1) water heater in Building 2 rated at 0.04 mmBtu/hr, one (1) water heater in Building 5 rated at 0.04 mmBtu/hr, one (1) water heater in Building 9 rated at 0.036 mmBtu/hr, and one (1) water heater in Building 11 rated at 0.04 mmBtu/hr;

(c) Enclosed space heaters
two (2) heaters in Building 2 each rated at 0.15 mmBtu/hr, one (1) heater in Building 3 rated at 0.14 mmBtu/hr, two (2) heaters in Building 6 each rated at 0.05 mmBtu/hr, two (2) heaters in Building 7 each rated at 0.3 mmBtu/hr, three (3) heaters in Building 8 each rated at 0.15 mmBtu/hr, four (4) heaters in Building 9 each rated at 0.3 mmBtu/hr, two (2) heaters in Building 9 each rated at 0.15

mmBtu/hr, one (1) heater in Building 9 rated at 0.08 mmBtu/hr, two (2) heaters in Building 9 each rated at 0.13 mmBtu/hr, one (1) heater in Building 11 rated at 0.1 mmBtu/hr, two (2) heaters in Building 12 each rated at 0.25 mmBtu/hr, one (1) heater in Building 17A rated at 0.325 mmBtu/hr, and three (3) heaters in Building 22 each rated at 0.2 mmBtu/hr;

(d) Radiant space heaters
twelve (12) heaters in Building 3 each rated at 0.05 mmBtu/hr, two (2) heaters in Building 4 each rated at 0.05 mmBtu/hr, twelve (12) heaters in Building 5 each rated at 0.05 mmBtu/hr, six (6) heaters in Building 6 each rated at 0.05 mmBtu/hr, fifteen (15) heaters in Building 7 each rated at 0.05 mmBtu/hr, five (5) heaters in Building 9 each rated at 0.1 mmBtu/hr, one (1) heater in Building 10 rated at 0.15 mmBtu/hr, and ten (10) heaters in Building 11 each rated at 0.105 mmBtu/hr;

(e) Air make-up units
one (1) unit in Building 12 rated at 1.0 mmBtu/hr, and one (1) unit in Building 17 rated at 1.25 mmBtu/hr;

(2) the following fuel oil fired combustion sources with heat input equal or less than two (2) mmBtu/hr and firing fuel containing less than 0.5 % sulfur by weight:

one (1) waste oil fired space heater in Building 2 rated at 0.1 mmBtu/hr;

(3) vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;

(4) degreasing operations that do not exceed 145 gallons per 12 months;

(5) the brazing, cutting, soldering and welding equipment related to manufacturing activities not resulting in the emissions of HAPs;

(6) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(7) paved and unpaved roads and parking lots with public access;

(8) purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;

(9) blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;

(10) on-site fire and emergency response training approved by the department;

(11) the following woodworking activities with particulate matter emissions equal to or below insignificant threshold of 5 pounds per hour:

(a) one (1) cyclone dust collection system controlling two (2) chop saws and one (1) drill press in Building 3;

(b) one (1) cyclone dust collection system controlling three (3) chop saws, one (1) table saw, two (2) routers, two (2) band saws, two (2) radial saws, one (1) shaper, one (1) belt sander, and one (1) drill press in Building 7;

(c) one (1) cyclone and baghouse dust collection system controlling nine (9) chop saws, three (3) band saws, one (1) sander, and one (1) mitre saw in Building 9;

(12) the following welding activities, in Building 17, with particulate matter emissions equal to or below insignificant threshold of 5 pounds per hour:

(a) five (5) stick welding stations using carbon electrodes with a maximum consumption rate of 15 electrodes per hour;

(b) three (3) metal inert Gas (MIG) steel welding stations using carbon AWS A5.18 wire with a maximum consumption rate of 1.0 unit per hour;

(c) four (4) MIG aluminum welding stations using type ER 4043 (aluminum) wire with a maximum consumption rate of 1.25 units per hour;

(13) the following storage tanks with VOC emissions equal to or below insignificant threshold of 15 pounds per day:

(a) one (1) 4,000 gallon above ground gasoline storage tank;

(b) one (1) 8,000 gallon above ground diesel storage tank;

(c) five (5) 300 gallon motor oil storage totes;

(14) various VOC containing handwipe solvents for repair work in Building 6, at a maximum capacity of 0.10 units per hour and with a potential emissions of below insignificant threshold of 15 pounds per day; and

(15) one (1) 3/16" metal and one (1) 1/8" aluminum saw, in Building 17, each with a maximum cutting rate of 2,400 inches per minute and with a potential particulate matter emissions of below insignificant threshold of 5 pounds per hour.

Source Definition

As noted above, Orbit Composites, Inc. and Better Way Products, Inc. are operating equipment in a Carriage, Inc. building. Orbit composites, Inc. and Better Way Products, Inc. are one source, which owns and operates a fiberglass manufacturing plant. Carriage Inc. is a separate source, which owns and operates an automotive manufacturing plant. The two sources do not have the same two-digit SIC, which are 30 and 37, respectively. One source, Orbit Composites and Better Way Products, supplies 5 - 10 % of their output to the other, Carriage, Inc.. Carriage, Inc. does not provide any support to Orbit Composites and Better Way Products. The sources are located on the same property.

Based upon this information, the sources are determined to be separate sources.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. The changes requested involve changes in the emission limit specified in the Part 70 permit. According to 326 IAC 2-7-12(b)(C)(i), a Minor Permit Modification cannot be used for changes that “change a case-by-case determination of an emission limit or other standard”. Therefore, pursuant to 326 IAC 2-7-12(d)(1), a Significant Permit Modification is used to process the changes that “do not qualify as Minor Permit Modifications”.

Existing Approvals

The source was issued a Part 70 Operating Permit T039-6326-00456 on February 10, 1999. The source has since received the following:

(a) First Significant Source Modification: 039-11304, Issuance Date: July 7, 2000**;**

(b) First Administrative Amendment: 039-12420, Issuance Date: July 26, 2000;

(c) Second Administrative Amendment: 039-15544, Issuance Date: June 12, 2002.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:
Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 9, 2002.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)[1]
PM	1181.2
PM-10	1181.2
SO_2	3.2
VOC	192.6
CO	13.3
NO_x	11.8

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene (worst case HAP)	41.4
TOTAL HAPs	99.0

[1] Includes the PTE of pollutants included in Significant Source Modification No: 039-11304

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and PM-10 are greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Total HAPs
Spray Booths	39.6	39.6	0.0	99.0	0.0	0.0	84.0
Combustion	11.6	11.6	3.2	0.9	13.3	11.8	0.0
Wood Working	0.9	0.9	0.0	0.0	0.0	0.0	0.0
Miscellaneous **	12.5	12.5	0.0	0.6	0.0	0.0	0.0
Spray Booth + Woodwork (Building 18 and 18A)	1.18	1.18	0.0	<25	0.0	0.0	15.0
Total Emissions	65.8	65.8	3.2	125.5	13.3	11.8	99.0

** Miscellaneous activities include degreasing, welding and metal cutting.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance for ozone.

(b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(1) This source is not subject to the New Source Performance Standards (326 IAC 12, 40 CFR Part 60.40c), Subpart Dc, since each of the boilers at this source has maximum heat input capacity of less than the applicability threshold of 10 mmBTU per hour.

(2) The source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63, Subpart JJ), because it is a major source for HAPs emissions, as defined in 40 CFR Part 63.2, and manufactures wood products that fall under the definition of “wood furniture”, as defined in 40 CFR 63.801. Therefore, pursuant to 40 CFR 63.800(e), the woodworking operations at the source must be in compliance with the requirements of Subpart JJ on or before December 7, 1998. The requirements of Subpart JJ include:

(a) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(b) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.

(B) For all other contact adhesives *(except aerosols and contact adhesives applied to nonporous substrates)* the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound

solids.

(c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

(d) The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calender days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum addresses each of the following work practice standards as defined under 40 CFR 63.803.

(A) Operator training course.
(B) Leak inspection and maintenance plan.
(C) Cleaning and washoff solvent accounting system.
(D) Chemical composition of cleaning and washoff solvents.
(E) Spray booth cleaning.
(F) Storage requirements.
(G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(H) Line cleaning.
(I) Gun cleaning.
(J) Washoff operations.
(K) Formulation assessment plan for finishing operations.

The three (3) surface coating booths, known as SC1, SC2 and SC3 are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart JJ because the source cuts the wood and assembles the cabinet front, which is sent to an outside vendor for sanding and finishing. The finished cabinets are then brought back for installation. Pursuant to 40 CFR §63.801(a), *Definitions*, this operation is not a wood furniture manufacturing operation.

(3) The source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63, Subpart T), since the degreasing solvents at the source do not contain any of the organic compounds that are subject to this rule.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD) and 40 CFR 52.21

This source, constructed before 1977 with several modifications in the 1990s and 2000, is not subject to the requirements of 326 IAC 2-2 (PSD), because it is not one of the 28 source categories and the source will limit all regulated pollutant emissions to less than 250 tons per year. The source will control the surface coating PM and PM-10 overspray emissions with air filters. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than 10 tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Although the spray booths in Building 17A have a PTE more than 10 tons per year of a single HAP, the booths were constructed before the rule applicability date of July 27, 1997. Therefore, these paint booths are not subject to the requirements of 326 IAC 2-4.1. The input VOC in Building 18A booths is limited to less than 25.0 tons per year. Therefore, the source will not emit ten (10) tons per year of a single HAP or twenty-five (25) tons per year of any combination of HAPs. Thus, the requirements of 326 IAC 2-4.1-1 do not apply to these booths.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 4, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. Pursuant to 326 IAC 8-6 (Organic Solvent Emission Limitations), the total VOC emissions from the following operations are limited to 99 tons per year:

(1) The VOC delivered to the applicators in Building 7 (commenced operation in 1976) and 17A (commenced operation in 1979), including clean-up solvents.

Therefore, the requirements of 326 IAC 8-6 will not apply.

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The six (6) natural gas fired boilers with a total heat input capacity of 3.15 mmBtu/hr and the 4.0 mmBtu/hr wood waste fired boiler, which were constructed after September 21, 1983, are subject to 326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating). Pursuant to this rule, particulate emissions from indirect heating facilities shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{7.15^{0.26}} = 0.65 \text{ lb/mmBtu}$$

The allowable particulate emission rate from all boilers at the source, based on the above equation, is 0.65 pounds per mmBtu heat input which is higher than the maximum of 0.6 pounds per mmBtu heat input allowed by 326 IAC 6-2-4(a). Therefore, the allowable PM emission rate for the boilers at the source is 0.6 pounds per mmBtu heat input. The particulate matter emissions from natural gas fired boilers are 0.012 pounds per mmBtu and are in compliance with the rule. The particulate matter emissions from the 4.0 mmBtu/hr wood waste fired boiler are also limited to 0.6 pounds per mmBtu and shall be in compliance with the requirements by operating the cyclone controlling the particulate matter emissions at all times when the boiler is in operation.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) emissions from woodworking and welding operations are limited as follows:

(a) the woodworking operations in Buildings 3, 7, 9, 12 and 22 shall be limited to 0.55, 1.62, 2.58, 1.02 and 1.62 pounds per hour, respectively. The source will be in compliance with these limitations by operating the dust collection systems at all times when woodworking is in operation.

(b) the welding activities in Building 17 shall be limited to 5.0 pounds per hour. The potential emissions from the welding activities (there are no control devices for these activities) are 1.20 pounds per hour and are in compliance with 326 IAC 6-3-2.

(c) the allowable PM emission rate from the woodworking operations in Building 18 shall not exceed 2.22 pounds per hour when operating at a process weight rate of 800 pounds per hour.

These PM emission limits were calculated using the following method:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the spray booths in Buildings 8, 12, 17A, and 18A shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The source will be in compliance with the requirement by using air filters at all times to control overspray emissions when these spray booths are in operation.

Pursuant to 326 IAC 6-3-2(d), the surface coating operations shall be subject to the following:

(1) The source shall operate the control device in accordance with manufacturer's specifications;

(2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
(A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground;
(B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground;

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray

is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not otherwise regulated by other provisions of article 8. This source has no facilities constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not otherwise regulated by other provisions of article 8. Therefore, this rule does not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal parts and products, for surface coating and aerosol spray operations, in Buildings 3, 5, 7, 8, 9, 17A and 22 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coating systems.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the paint booths are in compliance with this requirement.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

The wood furnishing surface coating operations in Building 12 and 18 are subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). Pursuant to this rule, the coatings applied to wood furnishings in Building 12 shall utilize an airless application system or one of the approved methods specified in the rule. The source shall be in compliance with the rule by using an airless application system in Building 12 and 18. The touch-up or repair operations in Buildings 3, 5, 7, 9 and 22 are limited to ten (10) gallons per day of coating. Therefore, pursuant to 326 IAC 8-2-12(b), the requirements of 326 IAC 8-2-12 do not apply to the touch-up or repair operations in Buildings 3, 5, 7, 9 and 22. The input of VOC to SC1, SC2 and SC3, shall be limited to less than twenty-five 25.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period.

326 IAC 8-3-2 (Cold Cleaner Operations) and 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The degreasing operations at the source are subject to the requirements of both 326 IAC 8-3-2 (Cold Cleaner Operations) and 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control).

Pursuant to 326 IAC 8-3-2, Carriage, Inc. shall:

(1) equip the cleaner with a cover;

(2) equip the cleaner with a facility for draining cleaned parts;

(3) close the degreaser cover whenever parts are not being handled in the cleaner;

(4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) provide a permanent, conspicuous label summarizing the operation requirements;

(6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

The cold cleaner organic degreasing operations at Carriage, Inc. do not have remote solvent

reservoirs. Therefore, 326 IAC 8-3-5(a) shall apply. Pursuant to 326 IAC 8-3-5(a), Carriage, Inc. shall also meet:

(1) the following control equipment requirements:

(a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(e) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(2) the following operating requirements:

(a) Close the cover whenever articles are not being handled in the degreaser.

(b) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(c) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the

waste solvent by weight could evaporate.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(1) VOC and VHAP emissions from woodworking operations have applicable compliance monitoring conditions as specified below:

(a) Document the VOC and VHAP content in pounds of VOC or VHAP per pound of solids, as applied for finishing materials, adhesives and strippable spray booth materials.

(b) Prepare and maintain a written work practice implementation plan that meets the minimum requirements as defined under 40 CFR 63.803.

(c) Submit an initial Compliance Report and the subsequent semi-annual Continuous Compliance Report.

The monitoring conditions are necessary because the woodworking operations must be in compliance with the requirements of Subpart JJ.

(2) VOC emissions from Buildings 7 and 17A have applicable compliance monitoring conditions as specified below:

(a) the total VOC emissions from the following operations are limited at 99 tons per year:

(A) the VOC delivered to the applicators in Buildings 7 and 17A, including clean-up solvents

These monitoring conditions are necessary to avoid the requirements of 326 IAC 2-2.

Compliance with the VOC usage limitation for SC1, SC2 and SC3 (Building 18A), shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4. Compliance shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

(3) The woodworking operations in Buildings 3, 7, 9, 12, 18, and 22 have applicable compliance monitoring conditions as specified below:

(a) Daily visible emissions notations of the dust collector exhausts for the woodworking operations in Buildings 3, 7, 9, 12 and 22 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because all dust collectors must operate properly to ensure compliance with 326 IAC 6-3 and to avoid the requirements of 326 IAC 2-2.

(b) For woodworking operations in Building 18, Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(4) The cyclone controlling the 4 mmBtu/hr wood waste fired boiler has applicable compliance monitoring conditions as specified below:

(a) Daily visible emissions notations of the cyclone exhausts for the 4 mmBtu/hr wood waste fired boiler in Building 20 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

The monitoring conditions are necessary because the cyclone must operate properly to ensure that the operation of the wood waste fired boiler is in compliance with 326 IAC 6-2-4.

Conclusion

The operation of this RV and Class C motor home manufacturing plant shall be subject to the conditions of the attached proposed Significant Permit Modification No. 039-16070-00456.

CHANGES TO PART 70 PERMIT

(1) Section D.1.3 is modified as follows (strikeout to show deletions and bold to show additions):

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-6] [326 IAC 2-2]

The total VOC emissions from the following operations are limited at 8.25 tons per month:

~~(a) the unreacted styrene ((9.5% of Resin COR 61, 27.1% of gel coat, and 14.1% of Resin 75-062) and the VOC delivered to the applicators of resin and gel coating spray booths in Plant #2 (Buildings 14, 15 and 16), including the catalysts and clean-up solvents.~~

(**a** ~~b~~) the VOC delivered to the applicators in Buildings 7 and 17A of Plant #1, including clean-up solvents.

(2) Condition D.1.4 and D.4.3 are modified as follows:

D.1.4 Particulate Matter (PM) ~~[326 IAC 6-3-2(c)]~~ **[326 IAC 6-3-2(d)][40 CFR 52 Subpart P]**

Pursuant to **40 CFR 52 Subpart P** ~~326 IAC 6-3-2 (Process Operations)~~, the particulate matter (PM) overspray from the spray booths shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The source will be in compliance with the requirement by using air filters at all times when the spray booths are in operation to control overspray emissions. The PM emission control will limit source wide potential PM emissions to less than 249 tons per year and, therefore, render 326 IAC 2-2 not applicable.

Pursuant to 326 IAC 6-3-2(d), the surface coating operations shall be subject to the following:

(1) The source shall operate the control device in accordance with manufacturer's specifications;
(2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
(A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground;
(B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground;

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.4.3 Particulate Matter (PM) ~~[326 IAC 6-3-2(c)]~~ **[326 IAC 6-3-2(d)][40 CFR 52 Subpart P]**

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) overspray from the spray booths shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Pursuant to 326 IAC 6-3-2(d), the surface coating operations shall be subject to the following:

(1) The source shall operate the control device in accordance with manufacturer's specifications;

(B) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground;

(B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground;

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

(3) The Part 70 Quarterly Report is modified as follows:

Part 70 Quarterly Report

Source Name:	Orbit Composites, Inc. and Better Way Products, Inc.
Source Address:	210 Wabash Street, Millersburg, IN 46543
Mailing Address:	70891 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.:	T039-15744-00570
Facility:	~~Plant #2 Fiberglass Manufacturing: (Buildings 14, 15 and 16), and~~ Buildings 7 and 17A ~~of Plant #1~~
Parameter:	total VOC emissions
Limit:	total VOC emissions from the following operations are limited at 8.25 tons per month:

~~(1) the unreacted styrene (9.5% of Resin COR 61, 27.1% of gel coat, and 14.1% of Resin 75-062) and the VOC delivered to the applicators of resin and gel coating spray booths in Plant #2 (Buildings 14, 15 and 16), including the catalysts and clean-up solvents.~~

(2) the VOC delivered to the applicators in Buildings 7 and 17A of Plant #1, including clean-up solvents.

(4) The Table of Contents is modified and re-numbered as follows: